

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio



United States of America

v.

Shedrick HAWKINS

Case No.

2:23-mj-355

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 06/08/2023 in the county of Franklin in the  
Southern District of Ohio, the defendant(s) violated:

Code Section

Title 21 USC Section 841 (a)(1) and  
(b)(1)(C)

Offense Description

Possession with intent to distribute a mixture or substance containing a  
detectable amount of cocaine.

Possession with intent to distribute a mixture or substance containing a  
detectable amount of fentanyl or fentanyl related compound.

This criminal complaint is based on these facts:

See attached affidavit

☐ Continued on the attached sheet.

  
Complainant's signature

Jake Heaberlin, Task Force Officer (TFO)

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/08/2023

Judge's signature

City and state: Columbus, Ohio

Chelsey M. Vascura

Printed name and title



**Affidavit in Support of a Criminal Complaint**

I, Jake Heaberlin, (hereinafter referred to as affiant) being duly sworn depose and state:

**Introduction**

Your affiant, Jacob Heaberlin, is a Detective with the Franklin County Sheriff's Office assigned to the Drug Enforcement Administration (DEA) Columbus District Office. I have been employed by the Franklin County Sheriff's Office for ten years, during which time I have worked in the Corrections Division, Training Academy, Patrol Bureau and most recently the Special Investigations Unit. I have participated in numerous investigations while on Patrol and within Special Investigations Unit, with a focus on narcotics possession and distribution.

I am a Task Force Agent of the DEA assigned to the Detroit Field Division, Columbus District Office. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18, United States Code, Section 2516(1).

I hold a Bachelor of Science degree from Urbana University (Criminal Justice) and an Ohio Peace Officer Training Academy – Basic Peace Officer certification. Throughout my career I have received the following specialized training: Patrol Drug Operations, Criminal Interdiction, Street Drug Recognition and Identification and Human Trafficking.

The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement sources and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**Probable Cause**

1. On June 7, 2023, the Franklin County Sheriff's Office (FCSO) Special Investigations Unit (SIU) applied for and were granted a State of Ohio search warrant for 314 Highview Landing, Columbus, Ohio 43207 (residence). The warrant was granted by Franklin County Municipal Court Judge Cynthia L. Ebner.

2. On June 8, 2023, the FCSO SIU executed the search warrant at the residence with the assistance of FCSO SWAT. Upon execution of the search warrant, two adults, to include Shedrick HAWKINS, and six children, ages ranging from approximately nine years old to infant, were located in the residence.

3. During the search of the residence, investigators located documents addressed to HAWKINS at the residence. It should be noted, during this investigation, FCSO-SIU Detectives were receiving geo-location data from a cellular phone of HAWKINS which stayed overnight in the approximate area of the residence almost daily. Additionally, during the search, FCSO-SIU Detectives located illicit controlled substances to include, over a kilogram quantity of suspected cocaine and fentanyl; four firearms, to include a Glock 17 9mm serial number BFP024 pistol

with a sear installed, two Glock 22 .40 caliber handguns, a Ruger Max9 9mm handgun, a hydraulic press commonly used to shape illicit controlled substances in kilogram sized quantifies; a money counter and an undetermined amount of U.S. currency. Following the conclusion of the search warrant, FCSO-SIU Detectives obtained an approximate weight and conducted field tests on the suspected cocaine and fentanyl. During this time, it was discovered, that the substance believed to be cocaine weighed 1,806 gross grams and field tested presumptive for cocaine. The substance believed to be fentanyl weighed 1,197 gross grams and field tested presumptive positive for fentanyl.

4. Following the execution of the search warrant, FCSO-SIU Detectives investigators attempted to interview HAWKINS. HAWKINS declined to be interviewed without his attorney present.

5. Based on the training and experience of the affiant, and a review of the evidence gathered by agents and other investigators assigned to this investigation, there is probable cause to believe Shedrick HAWKINS has violated 21 U.S.C. §§ 841(a)(1) and (b)(1)(C), Possession with intent to distribute a mixture or substance containing a detectable amount of cocaine and 21 U.S.C. §§ 841 (a)(1) and (b)(1)(C) and, possession with intent to distribute a mixture or substance containing a detectable amount of fentanyl or fentanyl related compound.

  
Jake Heaberlin  
Task Force Officer (TFO)

Sworn and subscribed to me this 8 day of June 2023.

  
CHELSEY M. VASCURA  
UNITED STATES MAGISTRATE JUDGE